

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS (Western Division)

DIRECTV, Inc., a California corporation, // Case No. 03-30274-KPN

Plaintiff,

v.

SHANE MORTIMER

Defendant.

ANSWER TO COMPLAINT AS FOLLOWS;

COMES NOW DEFENDANT, (**SHANE MORTIMER**) who hereby responds,

alleges and answers the Complaint as follows:

1. With respect to paragraphs 1,2 and 3 of the complaint, this answering defendant lacks information sufficient so as to form a belief as to the truth or falsity of the allegations and on that basis denies each and every all and singular, the allegations contained therein.
2. With respect to the paragraph 4 of the complaint, this answering defendant expressly denies each and every allegation therein contained; except that this answering defendant admits that he is in fact a resident of this judicial district.
3. With respect to paragraph 5 of the complaint, this

answering defendant denies each and every all and singular, the allegations contained therein.

4. With respect to paragraphs, 6, 7 and 8 of the complaint, this answering defendant denies any wrongdoing that would make this matter subject to federal question jurisdiction.
5. With respect to paragraph 9 of the subject complaint, this answering defendant lacks information sufficient so as to form a belief as to the truth or falsity of said allegations and on that basis denies the same.
6. With respect to paragraph 10, 12, 13, 14 and 15 of the subject complaint, this answering defendant lacks information sufficient so as to form a belief as to the truth or falsity of said allegations and on that basis denies the same and further alleges that these allegations and individually named defendants have no relationship in fact or otherwise with this answering defendant. On that basis, this answering defendant seeks, by way of motion to be filed, the order of this court severing this answering defendant's action from those of the other named defendants.
7. With respect to paragraph 11 of the subject complaint, this answering defendant expressly denies each and

every allegation therein.

8. With respect to paragraph 16 of the subject complaint, this answering defendant repeats the averments and answers given to each and every of the paragraphs of the complaint, 1 through 15, inclusive.

9. With respect to paragraphs 17, 18, and 19 of the subject complaint, this answering defendant denies each and every all and singular, the allegations contained therein.

10. With respect to paragraph 20 of the complaint, this answering defendant repeats the averments and answers given to each and every of the paragraphs of the complaint, 1 through 19, inclusive.

11. With respect to paragraphs 21, 22, and 23, of the subject complaint, this answering defendant denies each and every all and singular, the allegations contained therein.

12. With respect to paragraphs 21, 22 and 23 of the complaint, I deny each and every allegation, all and singular, contained therein.

13. With respect to paragraph 24 of the subject complaint, this answering defendant repeats the averments and answers given to each and every of the paragraphs of

the complaint, 1 through 23, inclusive.

14. With respect to paragraphs 25, 26, 27 and 28 of the subject complaint, this answering defendant denies each and every all and singular, the allegations contained therein.

15. With respect to paragraph 29 of the complaint, this answering defendant repeats the averments and answers given to each and every of the paragraphs of the complaint, 1 though 28, inclusive.

16. With respect to paragraphs 30, 31 and 32 of the subject complaint, this answering defendant denies each and every all and singular, the allegations contained therein.

WHEREFORE, this answering defendant prays that Plaintiff take nothing by way of its complaint and that this court declare this action frivolous and without merit.

Dated this 26th day of February, 2004

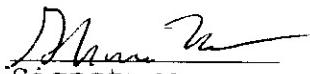
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via regular U.S. Mail to,

(John M. McLaughlin)
McLaughlin Sacks, LLC
31 Trumbull Road
Northampton, MA 01060

this 26 day of February (2004).

Shane Mortimer


Signature

Shane Mortimer
184 Church Street
Ludlow, MA 01056